



INTEROFFICE MEMORANDUM

DATE: November 16, 1999

TO: S. J. Hahn, K-H, Bldg 130, X9888

FROM: S. M. Nesta, K-H/ESS, T130C, X6386 *SMNesta*

SUBJECT: NEPA DETERMINATION FOR BLDG 440 TRUPACT II SHIPPING FACILITY - SMN-152-99

I have reviewed the project to construct two TRUPACT II shipping bays on the east side of Bldg 440. I understand that the project includes removing structures on the east side of the building, and paving an area leading from the new shipping bays to Bldg 664. Grading on the north side of Bldg 440, to prevent drainage problems, will also be necessary.

The following environmental compliance issues are noted for this project:

Removal of structures on the east exterior wall of Bldg 440 (e.g., welding shed, railroad tracks, Bldg 664 fence), and regrading of the road for paving will cause soil disturbance. If sampling results indicate soil within the IHSSs is contaminated above acceptable soil action levels, then two actions should occur:

- 1) a berm or diversion should be installed to prevent surface water from reaching the area of contaminated soil, and
- 2) while awaiting treatment, the exposed contaminated soil should have a berm placed on the downhill side (or be placed in a container), to prevent water from running off the contaminated soil and into Site drainages.

This concern results from the possibility of uranium and beryllium contamination from IHSS 157.2, and plutonium and uranium contamination from IHSS 161. Questions regarding these comments should be directed to Ian Paton (x2680).

All construction waters within the excavation (i.e., from stormwater or groundwater infiltration) should be collected and managed in accordance with the Control and Disposition of Incidental Waters procedure (1-C91-EPR-SW.01). The Surface Water contact for this program is Sue Barker (x3114). Portable pumps for de-watering the excavation and poly tanks for temporary containment of the water can be obtained by contacting Russ Cirillo (x5876). An alternative approach would be to transport and treat all water collected in the excavation at the Consolidated Water Treatment Facility (Bldg 891), without waiting to analyze the water quality.

Where non-contaminated soil is exposed from excavation, berms to capture the runoff are not necessary, but downstream water quality protective measures should still be implemented. These typically include a silt fence for broad expanses of disturbed soil, or hay bales installed around storm drain inlets when installation of a silt fence is not practicable.

If sanitary drains are installed in the new building, each should be clearly labeled and protected (e.g., with berms) from inappropriate discharges that might be introduced during construction or operations.

The project states that there will be a soil disturbance and associated characterization or management requirements. The project discussion then indicates that contaminated soils will be managed as LLW, and that RFCA Tier II levels for hazardous constituents will be used. Since this is not an Environmental Restoration RFCA project, these parameters do not apply. Instead, the project will require a soil disturbance permit, and excavated soil must be characterized and managed in accordance with that permit. Questions regarding these comments should be directed to Greg Sollner at X3541.

No other environmental compliance issues are noted for this project.

With regard to the NEPA documentation for the project, I recommend that the project be categorically excluded from further NEPA documentation requirements, pending resolution of the aforementioned issues. Attached is a copy of the draft Categorical Exclusion (CX) Determination for the project. Please review the project description portion of the draft CX Determination for accuracy and completeness. Pending any changes you request, this document should be transmitted to RFFO's NEPA Compliance Officer (John Morris) with a request for a final NEPA determination on the project. To maintain tracking of NEPA projects, please copy me on your transmittal to RFFO, at which time we will forward an electronic copy of the CX to Mr. Morris for his use.

Also note that my conclusion is based on the assumption that the environmental consequences of accidents identified for the shipping facility will not exceed the consequences previously identified for the building itself. This condition is necessary to ensure that previous NEPA analyses continue to bound environmental consequences of the B440 complex, as reconfigured to include the new shipping bays and staging area. Additional NEPA analysis will be required if the above assumption proves to be invalid. It is also my understanding that a Safety Analysis Report (SAR) will be prepared in the future for the proposed facility. Please notify my office when the shipping facility SAR is available.

If changes arise that alter the scope of the project, please contact me so that we can review the changes for NEPA compliance. Please do not hesitate to contact me at X6386 if you have any questions or need additional information.

cc:

Karan North, K-H
Ted Hopkins, RMRS
Ian Paton, RMRS
Sue Barker, RMRS
Russ Cirillo, RMRS
file

<DATE>

99-RF-XXXX

J. Morris, NEPA Compliance Officer
DOE, RFFO

NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) DOCUMENTATION FOR
[PROJECT NAME] - YYY-XXX-99

Attached is a draft categorical exclusion for the subject project. Kaiser-Hill NEPA staff recommend that this project be categorically excluded from further NEPA documentation requirements. A draft Categorical Exclusion Determination is included for your review and an electronic copy of the draft Determination has been made available to you.

Please provide a final NEPA determination for this project at your earliest convenience. If you have any questions or need additional information, please contact [PROJECT CONTACT AND EXTENSION].

SAMPLE

Name, Director
Division

XXX:xxx

Orig. and 1 cc - J. Morris

Attachments:
As Stated (1).

cc:
S. M. Nesta, K-H

DOE NEPA REGULATIONS SUBPART D
CATEGORICAL EXCLUSION (CX) DETERMINATION - RFFO/CX00-99

Proposed Action: Construction and Operation of a TRUPACT II Shipping Facility

Location: Rocky Flats Environmental Technology Site, Golden, CO

Proposed by: U.S. Department of Energy Rocky Flats Field Office (DOE, RFFO)

Description of the Proposed Action:

The Rocky Flats Field Office (RFFO) proposes to construct and operate a TRUPACT II shipping facility, which will be located on the east side of Building 440. The facility will consist of a 115' X 125' metal building, with overhead double doors and overhead hoists. An area between the shipping facility and Building 664 will be paved to allow working space for the TRUPACT trucks.

Trucks with empty TRUPACT II containers will be driven into the facility, the TRUPACT II containers will be loaded with waste drums, and the loaded trucks will then be driven to an inspection station prior to leaving the Site. Waste drums will be staged at the shipping facility temporarily, until loaded onto a truck and removed. The facility will be capable of staging a maximum of 300 TRU/TRM drums within the two shipping bays. The turnover rate for the staged drums will usually be about ten days, at a rate of ten trucks loaded per week.

Categorical Exclusion to be Applied:

B1.15 Siting, construction (or modification), and operation of support buildings and support structures (including, but not limited to, trailers and prefabricated buildings) within or contiguous to an already developed area (where active utilities and currently used roads are readily accessible). Covered support buildings and structures include those for office purposes: parking; cafeteria services; education and training; visitor reception; computer and data processing services; employee health services or recreation activities; routine maintenance activities; storage of supplies and equipment for administrative services and routine maintenance activities; security (including security posts); fire protection; and similar support purposes, but excluding facilities for waste storage activities, except as provided in other parts of 10 CFR 1021, Subpart D, Appendix B.

Justification:

The proposed action is the same as the activities described by B1.15; that is, the project is for the construction and operation of a support structure. The structure will provide a covered area and equipment for loading trucks. Waste containers will also be *staged* at the facility prior to being loaded into the truck's TRUPACT II containers, but the facility will not be used for the storage of waste. Waste containers will only be moved into the facility

to enable loading of the trucks. The facility will be located within a developed area, where currently used roads and active utilities are available.

In accordance with 10 CFR 1021.410(b), the project (a) fits within the class of actions listed in Subpart D, Appendix B of 10 CFR 1021, (b) exhibits no extraordinary circumstances that may affect the significance of its environmental effects, and (c) is not "connected" (per 40 CFR 1508.25[a][1]) to other actions with potentially significant impacts, is not related to other proposed actions with cumulatively significant impacts (per 40 CFR 1508.25[a][2]), and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211.

Further, in accordance with 10 CFR 1021, Subpart D, Appendix B, the project would not (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, including requirements of DOE and/or Executive Orders, (2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators), (3) disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases; or (4) adversely affect environmentally sensitive resources.

I have determined that the proposed action meets the requirements for a categorical exclusion as defined in Subpart D of 10 CFR 1021. Therefore, I approve the categorical exclusion of the proposed action from further NEPA review and documentation.

Date: _____

Signature: _____

RFFO NEPA Compliance Officer